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Via ECF

September 22, 2016

The Honorable Paul G. Gardephe
United States District Judge
United States District Court for the
Southern District of New York
40 Foley Square
New York, New York 10007

Re: ***United States v. Tuzman, 15 Cr. 536 (PGG)***

Dear Judge Gardephe:

I represent Omar Amanat in the above-referenced action.

On consent of the government, I am writing to respectfully request that the Court grant two modifications to Mr. Amanat's conditions of pretrial release. *First*, that Mr. Amanat be permitted, after the conference today, September 22, 2016, to spend the day with his four year-old daughter at his ex-wife's home in Verona, New Jersey to celebrate his daughter's birthday. *Second*, that Mr. Amanat be permitted to visit his three children in Manhattan every Saturday from 12 p.m. to Sunday at 12 p.m.

Pretrial Services opposes both requests on the grounds that the requested modifications conflict with its policy to object to "social visits."

Mr. Amanat has six children: three teenage boys from his first wife, who live in Manhattan; and three young children, two boys and one girl, from his second wife, who live in Verona, New Jersey. He is a devoted father who is deeply involved in his children's lives including as previously serving as basketball coach for his son's teams. His current conditions of house arrest and electronic monitoring have strained his relationships with his children, who do not fully understand his current legal situation. Before his arrest in July, Mr. Amanat regularly exercised his visitation rights that permitted him to stay with his sons on Saturdays and spend the night at their home. Since his arrest, he has not been able to spend any meaningful time with his sons because he cannot travel to visit them.

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Mr. Amanat's conditions of release include a personal recognizance bond of \$2.5 million, secured by \$250,000 in cash, and co-signed by five family members who are serving as sureties. He is subject to house arrest, electronic monitoring, and restrictions limiting his occasional travel—which must be approved in advance and only for very limited reasons such as legal visits and medical appointments—to the District of New Jersey and the Southern and Eastern Districts of New York. For the two months since his arrest, Mr. Amanat has fully complied with the conditions of his release.

In these circumstances, we request the following modest modifications to Mr. Amanat's conditions of release:

- that Mr. Amanat be permitted to spend the day with his four-year-old daughter at his ex-wife's house in Verona, New Jersey after the conference before the Court and return to his current residence by 8 p.m.
- that Mr. Amanat be permitted to spend Saturdays from 12 p.m. to Sundays at 12 p.m. at first wife's home in Manhattan.

I thank the Court for its consideration in this matter.

Respectfully Submitted,

/s/ Eric M. Creizman
Eric M. Creizman

cc: Vincent Imbrosciano, U.S. Pretrial Services Officer (by email)
AUSAs Andrea Griswold and Damian Williams (by ECF and email)